

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
PAUL R. CASTNER,	:	
	:	CASE NO. 18-21827
DEBTOR,	:	
	:	CHAPTER 13
RONDA J. WINNECOUR, CHAPTER 13	:	
TRUSTEE,	:	DOCUMENT NO. 94
	:	
MOVANT,	:	RELATED TO DOC NO. 91
	:	
VS.	:	
	:	
PAUL R. CASTNER	:	
	:	
RESPONDENTS	:	

RESPONSE TO ORDER TO RULE TO SHOW CAUSE

AND NOW COMES PAUL R. CASTNER, Debtor, in the above Chapter 13 case, by and through his attorney, Louis Pomerico, and files this Response to Order to Rule to Show Cause and in support thereof avers as follows:

1. It is averred that a Hearing is scheduled for September 14, 2022, at 2:30 P.M. in Courtroom No. A, 54th Floor, U.S. Steel Tower, 600 Grant Street, Pittsburgh, Pennsylvania, 15219.
2. Debtor, through his attorney, avers that pursuant to the Conciliation Conference held on August 4, 2022, he was instructed to file a Proposed Order resolving the Trustee's Certificate of Default.
3. The Proposed Order was not filed inasmuch as the Undersigned was waiting for Debtor to make the new Plan payment in the amount of \$2,132.00 as verification that he was indeed able to to make the new Plan payment before filing the Order.

4. Debtor made a payment in the amount of \$2,132.00 on or about August 26, 2022.
5. Debtor, through his attorney, has simultaneously herewith filed the Proposed Order.

WHEREFORE, Debtor, Paul R. Castner, respectfully requests that this Honorable Court withdraw the Order to Show Cause and related hearing scheduled for September 14, 2022; allow Debtor to continue to make the Plan payments pursuant to the Order; and any and all relief the Court deems just and reasonable

Dated: September 6, 2022

/s/ Louis Pomerico, Esquire
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